

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)	
)	
Plaintiff,)	Case No. 3:21-cv-00923
)	
v.)	District Judge Richardson
)	
THE LAMPO GROUP, LLC, et al,)	Magistrate Judge Holmes
)	
Defendants.)	

SECOND MOTION TO DISMISS BY DEFENDANT, THE LAMPO GROUP, LLC

Defendant, The Lampo Group, LLC, (“Lampo”) by and through the undersigned counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves the Court to dismiss the First Amended Complaint (Doc. #21) filed against it by Plaintiff, Brad Amos, with prejudice.

This is an employment case. Plaintiff was formerly employed by Lampo. Defendant, Dave Ramsey, (“Ramsey”) is also employed by Lampo as the company’s CEO.

Plaintiff’s First Amended Complaint (Doc. #21) asserts claims against Lampo for retaliatory discharge under the Tennessee Public Protection Act, T.C.A. §50-1-304, religious discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, *et seq.*, and the Tennessee Human Rights Act, T.C.A. §4-21-101, *et. seq.*, fraud, promissory estoppel, and violations of T.C.A. §50-1-102. As explained in Lampo’s concurrently filed memorandum of law (Doc. #31), these claims are patently frivolous since they are not even supported by factual allegations in Plaintiff’s First Amended Complaint, time-barred, and/or not even available under applicable law.

Given the defects in Plaintiff’s claims against Lampo, we respectfully ask the Court to

dismiss them with prejudice and award any other relief to Lampo that the Court deems appropriate.

Respectfully submitted,

/s/Daniel Crowell

Leslie Goff Sanders (TN #18973)

Daniel Crowell (TN #31485)

JACKSON LEWIS P.C.

CitySpace

611 Commerce Street

Suite 3102

Nashville, TN 37203

Telephone: (615) 915-3300

leslie.sanders@jacksonlewis.com

daniel.crowell@jacksonlewis.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that, on March 16, 2022, I caused the foregoing *Second Motion to Dismiss* by Defendant, *The Lampo Group, LLC*, to be filed via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street
Brandon Hall
Cullen Hamelin
Lauren Irwin
THE EMPLOYMENT LAW AND CONSUMER LAW GROUP
street@eclaw.com
bhall@eclaw.com
chamelin@eclaw.com
lauren@eclaw.com

Attorneys for Plaintiff

/s/Daniel Crowell
Daniel Crowell (TN #31485)
Attorney for Defendants